

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

	X	
In re	:	
	:	Chapter 11
<b>OKLAHOMA FORGE, LLC, d/b/a</b>	:	
<b>OKLAHOMA FORGE, INC.</b>	:	Case No. 24-11060-T
	:	
Debtor.	:	
	X	

**DEBTOR’S APPLICATION (I) TO SET AN EXPEDITED HEARING ON THE SALE OF  
SUBSTANTIALLY ALL OF THE DEBTOR’S ASSETS FREE AND CLEAR OF ALL LIENS,  
AND (II) TO SHORTEN THE TIME FOR REPONSES TO THE MOTION TO SELL  
SUBSTANTIALLY ALL THE DEBTOR’S ASSETS FREE AND CLEAR OF ALL LIENS**

Oklahoma Forge, LLC, as Debtor and Debtor in Possession (the “Debtor”), hereby submits this application (the “Application”) for the purpose of requesting the Court (i) to set an expedited hearing some time the week of April 28th, 2025, on the Debtor’s motion filed by the Debtor, today, April 14, 2025: *Debtor’s Motion for an Order (1) Authorizing Sale of Substantially All of the Debtor’s Assets Free and Clear of All Liens, Claims, Encumbrances and other Interests, (2) Approving Distribution of Sale Proceeds, and (3) Granting Related Relief (the "Sale Motion") [Doc. 317]* (ii) to shorten the notice period from twenty-one (21) days to ten (10) days, which would make all responses to the Sale Motion due on or before April 24, 2025. In support of this Application, Debtor relies on the *Declaration of James J. Connor in Support of Debtor’s First Day Pleadings* (the “Connor Declaration”) filed at docket number 91 in the above-captioned bankruptcy case and incorporated herein by reference, and respectfully states as follows:

**Background**

1. On August 16, 2024 (the “Petition Date”), a petition for involuntary relief under chapter 7 [Doc. 1] was filed against the Debtor under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing the above-captioned bankruptcy case (the

“Case”). On November 22, 2024, the Court entered an order converting this case to a case under chapter 11 of the Bankruptcy Code [Doc. 60].

2. Since the Petition Date, the Debtor has continued to manage its business assets as a debtor in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

3. As of the Petition Date, Debtor employs 2 full-time employees. The Debtor has sufficient funds to operate until May 15, 2025.

4. Additional factual background relating to Debtor’s business and the commencement of this Case is set forth in detail in the Connor Declaration.

### **Facts Specific to the Relief Requested**

5. Debtor has filed the Sale Motion seeking to sell substantially all its assets at a public auction. The date requested herein for a hearing on the Sale Motion is sufficiently in the future to allow ample time for notice of the Sale Motion to be provided to all parties in this case.

6. The Sale Motion requests relief essential to the Debtor as the Debtor is not operating and has been shut down since August 1, 2024, due to its lack of cash or other liquidity necessary to continue its operations. Therefore, the Debtor requests the Court hear the Sale Motion on an expedited basis.

### **Conclusion**

WHEREFORE, for the reasons set forth herein, Debtor respectfully requests that the Court (a) grant the Debtor an expedited hearing on the Sale Motion, (b) grant the Debtor's request to shorten the notice period, and (c) grant such other and further relief as is just and proper.

Dated: April 14, 2025.

Respectfully submitted,

s/ Mark A. Craige

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